From: Michael Stephenson
To: Jump, Christine; smith.martin@cleanharbors.com
Subject: RE: Building J rinsate results
Date: Tuesday, April 01, 2014 2:33:33 PM

Hi Chris,

Thanks for helping us through this.

As you and I discussed last Friday, the depiction of soil excavation areas in Figure 9 is not sufficiently detailed, nor should it be used, to make a determination of whether concrete is in contact with contaminated soil. However, the soil samples collected immediately beneath the concrete as called for in the closure plan and collected during the RFI provide precisely the right information to make this determination. As Akhter stated in his March 28 email under item number 1,

1. " We agree with your procedure of only reusing concrete and soil as backfill not in contact with contaminated zone. "

We believe the data provided for Building J and the area southeast of Building J indicates the concrete in these areas is suitable for use as backfill. Of course we are happy to respond directly to any questions that Ahkter may have. In the meantime we will continue to transmit rinsate results along with data for soils underlying the concrete to assist KDHE and EPA in determining the appropriate re-use or disposal option for concrete removed as a part of this IRM.

Clean Harbors has no issues concerning the other conditions presented in Akhter's conditional approval email of March 28 so long as the appropriate data is used in addressing these conditions. Once again, Figure 9 of the DRAFT IRM work plan is not suitable for this purpose. As such, we will proceed accordingly and continue to transmit rinsate data as they become available.

Thanks again Chris, and please don't hesitate to call if you wish to discuss further.

Mike Stephenson
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From: Jump, Christine [mailto:Jump.Chris@epa.gov]
Sent: Monday, March 31, 2014 11:20 AM
To: smith.martin@cleanharbors.com; Michael Stephenson
Subject: FW: Building J rinsate results

Marty and Mike-

On Friday Akhter expressed concern to me that Figure 9 (the one that shows depth of contamination) does not match the shallow data in these extracted tables, and that according to the figure, the concrete in areas shaded yellow, pink and blue could not be used for backfill. I tried to explain to him that the tables showed a greater level of detail regarding depth than the figures but he still had concerns. I also tried to explain that the figure showing depth of contamination was intended more for use during removal for corrective action rather than to determine closure but he still has concerns.

You may want to consider a way in the tables or text to clarify this issue.

Feel free to give me a call if you want to talk about it. (I have a call from 1:30 to 2:00 central time, but am free the rest of the day)

I am working on comments for the IRM work plan, but I will be out of the office in meetings tomorrow and Wednesday. I will try to get some draft comments out by the end of today on the confirmation sampling, but it may be Friday or early next week before I can officially respond to the entire work plan.

Chris Jump, L.G.
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Mailing address: 11201 Renner Boulevard, Lenexa, KS 66219

From: Michael Stephenson [mailto:mstephenson@cameron-cole.com]
Sent: Friday, March 28, 2014 2:07 PM
To: Akhter Hossain; SMITH, MARTIN L; Mostafa Kamal
Cc: Jump, Christine; Jana, Michael J; Tony Carmeli
Subject: RE: Building J rinsate results

Hello Akhter and Team,

Attached are two Pdf files which have been extracted from Table 2 of the IRM Work Plan.

Bldg J Beneath Concrete – this table provides all of the data collected from Building J at a depth of 0.5 feet below ground surface. As shown in the table, no COCs were present at levels exceeding IAOs at a depth of 0.5 feet below ground surface, and these samples were collected immediately beneath the concrete in all Building J borings.

SEBJ Beneath Concrete – This file provides all of the fixed lab data from the SEBJ series of borings located south/southeast of Building J. As shown in the table, the shallowest depth at which COC

concentrations exceeded IAOs was 10 feet. The mobile lab data (IRM Work Plan Table 3) similarly indicate that no COCs are present at levels exceeding IAOs at depths shallower than 10 feet.

These data indicate that the soils underlying the concrete within Building J and south/southeast of Building J do not contain COCs at levels exceeding IAOs.

To facilitate your review of future rinsate result transmittals, a table showing the results obtained from soils immediately beneath (or as close to the concrete as is available) will be sent along with the rinsate results to provide an indication of soil conditions on the underside of the concrete.

If you have any questions or concerns, please don't hesitate to call or email.

Thanks,

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From: Akhter Hossain [mailto:ahossain@kdheks.gov]
Sent: Friday, March 28, 2014 11:09 AM
To: 'SMITH, MARTIN L'; Mostafa Kamal
Cc: Jump, Christine; Michael Stephenson; Jana, Michael J
Subject: RE: Building J rinsate results

Martin,

KDHE reviewed the submitted lab data from rinse water samples at building J. KDHE also reviewed figure 9 of the draft work plan showing the vertical intervals of contaminant presence as identified in your email dated March 27th 2014. We agree with your position that concretes directly overlying contaminated soils should be disposed of as waste (indicated as 0-5' and 0-10' depths).

Overlying concrete can be used as backfill where contaminant is located in the 5-10 feet depth, since concrete is not directly in contact with contaminated soil. Therefore this approval is based on the following condition:

2. We agree with your procedure of only reusing concrete and soil as backfill not in contact with contaminated zone.

3. After cutting the concrete floor, if any visible stain is shown, facility will address the application of approved technologies and perform sampling and analysis as needed.

4. Kansas PE should be present during critical activities such as confirmation sampling, etc. Nevertheless, accurate documentation should be retained through photographs, field notes, etc.

5. The facility will respond to EPA's comment adequately.

Akhter Hossain, P.E
KDHE/BWM

From: SMITH, MARTIN L [mailto:smith.martin@cleanharbors.com]
Sent: Thursday, March 27, 2014 9:34 AM
To: Akhter Hossain; Mostafa Kamal
Cc: Jump, Christine; Michael Stephenson; Jana, Michael J
Subject: RE: Building J rinsate results

Good morning Akhter and Mostafa. I wanted to offer one small clarification on one of your points from yesterday's call.

We agreed on the call that concrete overlying soils directly would be disposed of as waste. The clarification is that ***not all areas where concrete may overlay soil are, in fact, contaminated near the surface***. In fact, the color coding on Figure 9 of the draft work plan shows the contaminant vertical intervals. Many areas have clean soil for the first five feet or more under the surface. As stated in the work plan, these soils and any overlying concrete would be used as fill since no contact with contaminated soil occurs in the shallow soils (and therefore no concrete at the surface is in contact with contamination). As a measure of caution, the work plan states that we will assume that the interval of contamination actually begins one foot shallower than was actually determined through RFI extent sampling. In offering that, we are insuring that we will not be removing contaminated soils along with clean overburden soils that are to be used for backfill. Similarly, surface gravels and leveling course gravel (under concrete) in these clean areas would also be used as fill.

Please call me if you have any further questions about our approach.

Safety Starts With Me: Live It 3-6-5

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From: Jump, Christine [mailto:Jump.Chris@epa.gov]
Sent: Wednesday, March 26, 2014 3:19 PM
To: Michael Stephenson
Cc: SMITH, MARTIN L; Akhter Hossain
Subject: RE: Building J rinsate results

Mike-

Did you collect any lab blanks or do lab analysis of the water source for cleaning the CH buildings?

Thanks.

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From: Michael Stephenson [mailto:mstephenson@cameron-cole.com]
Sent: Friday, March 21, 2014 3:17 PM
To: Jump, Christine; John Cook; ahossain@kdheks.gov; mkamal@kdheks.gov
Cc: smith.martin@cleanharbors.com; Tony Carmeli; Lisa Hennessy; Jana, Michael J; STEWART, LON R
Subject: Building J rinsate results

Hello All,

Attached please find the analytical results for rinsate samples collected in Building J following decontamination. This is the format that we intend to use for all rinsate result transmittals, and we welcome your comments as to how we can make these results easy for you to review.

Within this workbook you will find the following worksheets

Contents – A listing of the contents of the work book
Site Map – A map of the site depicting the location for the building results being transmitted
Bldg J Figure – a figure depicting the discreet areas and from which rinsate samples were collected
Bldg J Table – A table of all rinsate results with shading used to indicate detections and exceedances of KDHE Tier II levels

Bldg J D&F – A table with dioxin and furan analytical results

As we discussed in our conference call on February 27, Clean Harbors is seeking a determination of whether the rubble generated from the removal of the concrete floor within Building J can be used for backfill. Because Bldg J will not be demolished, no other waste streams will be generated other than the concrete floor. Your response on or before March 28 would be greatly appreciated.

Please call myself, Martin Smith or Tony Carmeli with any questions or comments that you have.

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